SNO-ISLE
LIBRARIES

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November 5, 2013

Re: **Modernizing the E-rate**
    Program for Schools and Libraries

WC Docket No. 13-184

Thank you for this opportunity to comment on the FCC Notice of Proposed Rulemaking released on July 23, 2013 regarding the Modernizing the E-rate Program for Schools and Libraries (WC Docket No. 13-184).

Sno-Isle Intercounty Rural Library District strongly urges the Commission to provide funding at the $5 billion level to more adequately match the funding request levels that the Universal Service Fund has received during the past few years. The technology environment has changed dramatically since 1998 and the original design of the E-rate administration and its funding caps are not keeping up with these changes.

Furthermore, the demand for computer services and internet access by our library patrons has also grown during this time period and libraries are challenged to keep up with the greater bandwidths that are required to keep our patrons connected to the educational materials, job search tools, medical information, government services, etc. that they need.

I support several of the proposals to streamline the administration of the E-rate program including:

1. Sending funding disbursements from approved BEAR forms directly from USAC to applicants.
2. Eliminating the 486 form and adding the start date, Tech Plan approval/waiver, and CIPA certifications to the 471 or BEAR forms.
3. Modifying the BEAR form to allow applicants to indicate when they are submitting the final BEAR form for an FRN for that year. A simple checkbox could eliminate the need to file a form 500 and release the excess funds into the carryover pool sooner than currently experienced.
4. Allowing funding requests for multi-year contracts up to three year terms to be made with a single multi-year FRN; however, do not make this mandatory because the complexity of contracts and services varies and it may not be feasible to make a projection four years in advance.
5. Eliminating the requirement for cost allocation of off-site use of approved internet devices. Some libraries are moving toward a more cost effective approach than bookmobiles by providing limited library services to remote patrons at community and senior centers with laptop computers and a smaller van to deliver ordered materials.
6. Making electronic filing and especially electronic notifications from USAC mandatory. Divert the paper and postage savings at USAC into more funding awards to applicants.
7. Making past application information available on-line.

8. Improving the transparency of the review process with more descriptive application status labels.
9. Imposing deadlines for the entire application review process so that applicants receive funding decisions much earlier than is currently experienced.
10. Posting deadlines for each phase of an individual application under review. Many applications are routinely listed as in "Initial Review" for several months with no contact between USAC and applicants.

I would also like to express my disagreement with a few of the proposals as follows:

1. Please do not increase the document retention period to 10 years - this seems excessive, especially if more documents can be made available on-line.
2. Please do not require an officer of the Service Provider or Billed Entity to sign off on all E-rate forms - this would significantly slow down the administration and processing of forms.

We respectfully request that any changes made to the eligible services list that would significantly reduce funding to an applicant be further studied. Applicants must be given the opportunity to calculate and plan for any elimination of funding. I was unable to determine the financial impacts on our library based on the posted NPRM. For example, if telephone services were no longer eligible, the Library's Information Technology budget would be seriously affected and we would need to reapportion funds and/or delay other projects to cover that funding gap. This could detrimentally impact other IT projects and in the end could hinder the goals of the E-rate program.

We would also like to see more information on the plans to increase the redistribution of funds from Urban to Rural areas before any final decisions are made. If you are making changes to the discount structure, we request that you also factor in another disparity in funding distribution for libraries. For example, most libraries have never been eligible for the highest discount levels and therefore have never received Internal Connections funding.

We ask that you give special consideration to the important technologically dependent services provided by libraries. Much of the NPRM and comments have been focused on the issues with schools, however, more attention and research should be given to the great success the E-rate program has achieved in addressing the technology divide through programs at our libraries. Please ensure that these important services offered at libraries can be maintained, if not increased, so that the goals of E-rate can extend not just to our youth in schools, but to our entire communities.

Thank you for allowing me to comment on the proposed changes to the E-rate program.

Sincerely,

Gary Sitzman

Administrative Services Director
Sno-Isle Intercounty Rural Library District